

**EXHIBIT D**

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1 LAW OFFICE OF DANIEL MARKS  
2 DANIEL MARKS, ESQ.  
3 Nevada State Bar No.: 002003  
4 NICOLE M. YOUNG, ESQ.  
5 Nevada State Bar No. 12659  
6 610 South Ninth Street  
7 Las Vegas, Nevada 89101  
8 [Office@danielmarks.net](mailto:Office@danielmarks.net)  
9 *Attorneys for Plaintiff*

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11 UNITED STATES DISTRICT COURT  
12 DISTRICT OF NEVADA

13 PARNELL COLVIN,  
14 Plaintiff,

Case No. 2:20-cv-01765-APG-EJY

15 v.

16 M.J. DEAN CONSTRUCTION, INC.,  
17 Defendant,  
18 \_\_\_\_\_ /

19 **RESPONSE TO DEFENDANT'S INTERROGATORIES TO PLAINTIFF (SET ONE)**

20 COMES NOW the Plaintiff, Parnell Colvin, by and through his attorneys, Daniel Marks,  
21 Esq., and Nicole M. Young, Esq., of the Law Office of Daniel Marks, and hereby submits his  
22 Response to Defendant's Interrogatories to Plaintiff (Set One) as follows:

23 **INTERROGATORY NO. 1:**

24 If you attribute any loss of income as a result of your loss of employment at MJ Dean,  
25 state the total amount of income and benefits you have lost to date and how the amount was  
26 calculated.

27 **RESPONSE TO INTERROGATORY NO. 1:**

28 Plaintiff earned \$58.02 per hour and worked approximately 50 hours per week with  
Defendant M.J. Dean Construction, Inc. That hourly amount includes Plaintiff's pension,  
vacation, and health insurance benefits. Accordingly, Plaintiff's lost wages total \$191,466  
through July 10, 2021.

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1 **INTERROGATORY NO. 2:**

2 If you obtained other employment since your last day of employment at MJ Dean, for  
3 each job you have held, state:

- 4 (a) When the new employment commenced;  
5 (b) The hourly rate or monthly salary for the new employment; and  
6 (c) The benefits provided.

7 **RESPONSE TO INTERROGATORY NO. 2:**

8 Plaintiff has not obtained new employment since his termination from Defendant M.J.  
9 Dean Construction, Inc. Plaintiff is hopeful he will obtain new employment soon.

10 **INTERROGATORY NO. 3:**

11 Are there any other damages that you attribute to your loss of employment at MJ Dean? If  
12 so, for each item of damage state:

- 13 (a) The nature;  
14 (b) The date it occurred;  
15 (c) The amount; and  
16 (d) The name, address and telephone number of each person wh has knowledge of the  
17 nature of the damage.  
18 (e) The name, address and telephone number of each person wh has knowledge of the  
19 amount of the damage.

20 **RESPONSE TO INTERROGATORY NO. 3:**

21 Other than Plaintiff's lost wages of \$191,466, he is seeking compensatory damages,  
22 according to proof at trial, for pain and suffering, including humiliation, embarrassment, and  
23 emotional distress he suffered as a result of the race discrimination and retaliation for objecting  
24 to that discrimination resulting in the termination of employment at issue.

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1 **INTERROGATORY NO. 4:**

2 Do any documents support the existence or amount of any item of damages claimed in  
3 Interrogatories 1-3? If so, identify each document and state the name, address, and telephone  
4 number of each person who has each document.

5 **RESPONSE TO INTERROGATORY NO. 4:**

6 See Laborers 2018-2023 Master Labor Agreement, attached to Plaintiff's Second  
7 Supplemental Disclosure at Bate Stamp COLVIN 00103-145, served concurrently herewith

8 DATED this 8th day of July, 2021.

9  
10 LAW OFFICE OF DANIEL MARKS

11 /s/ Nicole M. Young

12 DANIEL MARKS, ESQ.  
13 Nevada State Bar No. 002003  
14 NICOLE M. YOUNG, ESQ.  
15 Nevada State Bar No. 12659  
16 610 South Ninth Street  
17 Las Vegas, Nevada 89101  
18 Attorneys for Plaintiff  
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**DECLARATION**

PARNELL COLVIN, being first duly sworn under penalty of perjury under the law of the State of Nevada, deposes and says:

That I am the Plaintiff in the above-entitled matter; that he has read the above and foregoing, **RESPONSE TO DEFENDANT'S INTERROGATORIES TO PLAINTIFF (SET ONE)** and knows the contents thereof; that the same are true of his knowledge except for those matters stated upon information and belief, and as to those matters, he believes them to be true.

DATED this 6 day of July, 2021

  
\_\_\_\_\_  
PARNELL COLVIN

**CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of the LAW OFFICE OF DANIEL MARKS, and that on the 8th day of July, 2021, I did deposit in the United States Post Office, at Las Vegas, Nevada, in a sealed envelope with first class postage fully prepaid thereon, and deliver via e-mail a true and correct copy of the above and foregoing **RESPONSE TO DEFENDANT'S INTERROGATORIES TO PLAINTIFF (SET ONE)**, upon the Defendant at the following:

Martin A. Little, Esq.  
Robert L. Rosenthal, Esq.  
HOWARD & HOWARD ATTORNEYS PLLC  
3800 Howard Hughes Parkway, Suite 100  
Las Vegas, Nevada 89169  
*Attorneys for Defendant*

/s/ Jessica Flores  
An employee of the  
LAW OFFICE OF DANIEL MARKS